

WIRELESS DIVISION

Members of the Wisconsin State Telecommunications Association, Inc.

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554**

In the Matter of)
)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

**COMMENTS OF THE WIRELESS DIVISION OF THE
WISCONSIN STATE TELECOMMUNICATIONS ASSOCIATION**

The Wireless Division of the Wisconsin State Telecommunications Association (Wireless Division) supports the comments submitted by the CTIA in the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45.

Specifically, the Wireless Division supports the goal of curbing growth in the size of the universal service fund, which can be achieved through an examination of the Commission's underlying universal service mechanisms. Changes made to the underlying mechanisms, should be competitively and technologically neutral manner, as required by the Act.

In supporting the comments of the CTIA, the Wireless Division would stress that Wireless ETCs provide tangible benefits to rural consumers while receiving a relatively small portion of high-cost support. The Wireless Division also agrees that no ETC Petitions should be held up during this proceeding and concurs that voluntary guidelines could aid states in evaluating whether an ETC designation is in the public interest.

In your decision, the Commission should reject proposals to include dominant carrier requirements in ETC designation guidelines and not adopt limits on the number of competitive ETCs, which are discriminatory in nature.

The Wireless Division believes the Joint Board's "Primary Line" proposals discriminate against wireless competition and contain significant administrative problems.

Finally, we encourage you to consider the other competitively-neutral proposals before the Commission.

Sincerely,

The Wireless Division of the WSTA

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